

# LA SORSA & BENEVEN

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July 1, 2022

## JOINT APPLICATION FOR ADJOURNMENT OF SETTLEMENT CONFERENCE

Via ECF  
and Via e-mail [Aaron\\_NYSDChambers@nysd.uscourts.gov](mailto:Aaron_NYSDChambers@nysd.uscourts.gov)

Hon. Stewart D. Aaron  
United States Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

ENDORSEMENT: Request GRANTED. The parties are directed to submit to Chambers an email providing three (3) alternative dates for an adjourned settlement conference.

SO ORDERED.



Re: Elizabeth Rodriguez v. United States of America et al.  
File No.: 21 Civ. 2075 (PAE)

Dear Judge Aaron:

Please accept this letter as a joint application, requesting an adjournment of the Telephonic Settlement Conference, currently scheduled for July 13, 2022, at 2:00 p.m.

The parties have made efforts to resolve the case while discovery is still ongoing. In that vein, a settlement offer has been made and rejected. Additionally, on June 30, 2022, Judge Engelmayer extended the completion/closure date for expert discovery until August 5, 2022.

The parties agree that expert discovery needs to be completed for the Settlement Conference to be meaningful and productive. Accordingly, the parties are respectfully requesting that the Settlement Conference be adjourned until after the August 5, 2022 close of expert discovery.

Hon. Stewart D. Aaron  
Elizabeth Rodriguez v. United States of America et al.  
File No.: 21 Civ. 2075 (PAE)  
Page 2

We thank the Court for its consideration of this request.

Respectfully,

La Sorsa & Beneventano

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cc: Tara Schwartz, Esq. (Via ECF)